

# **2012 AHERA 3-Year Asbestos Re-inspection Report Management Plan Update**

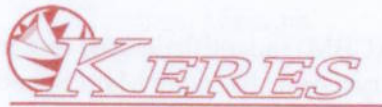
**Sky City Community School  
P.O. Box 349  
44 Pinsbaari Drive  
Acoma Pueblo, New Mexico**

**Submitted to:**

**Mr. Simon Nunez Jr.  
U.S. Department of the Interior  
Bureau of Indian Education  
New Mexico South  
1001 Indian School Road NW, Suite 149  
Albuquerque, New Mexico**

**September 7, 2012**

**Submitted by:**



**5600 Wyoming Boulevard NE, Suite 150  
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**ENVIRONMENTAL**

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**Prepared by:**

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**Rod L. Pawloski  
Program Manager**

**Reviewed by:**

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**Joseph K. Palermo, LEED® AP  
Regional Manager**

**Project No. 12P-A3077A**

**Summary of Findings  
2012 AHERA Re-inspection**

**Sky City Community School  
P.O. Box 349  
44 Pinsbaari Drive  
Acoma Pueblo, New Mexico**

**CONTENTS:**

- 1. Comments - 2012 AHERA 3-Year Re-inspection of Bureau of Indian Education, New Mexico South – Sky City Community School**
- 2. Summary of Management Plan Changes**
- 3. EPA Re-inspection Form 2, Re-inspection of ACBM: Findings and Management Planner Recommendations**
- 4. Report of Limited Asbestos-Containing Material Survey**

**Comments:**

1. This Asbestos Hazard Emergency Response Action (AHERA) 3-Year Re-inspection was completed by relying on previous inspection reports completed in 2004, 2005, and 2009, as well as the 2009 Management Plan Update.
2. The only Asbestos Containing Building Material (ACBM) indentified at the Site in the 2009 Management Plan Update included textured drywall walls in the Main School Building (Building 100).
3. Due to discrepancies in the sampling and the laboratory analysis findings detailed in the 2009 re-inspection report, the textured drywall walls were re-sampled and re-submitted for laboratory analysis. Point Count analysis of the textured drywall walls, using methods outlined in the AHERA 40 CFR 763, Subpart E, Appendix E, 1.7.2.4, *Quantitation of Asbestos Content*, determined that the previously identified ACBM contains a trace of asbestos confirmed by laboratory analysis at less than 1% and therefore not ACBM.
4. Based on the laboratory results of the re-sampling, the textured drywall walls, previously determined as ACBM, will be removed from the Management Plan.
5. Recommendations provided in the Form 2 pages and the Summary of Management Plan Changes should be incorporated into the Asbestos Management Plan for this building.
6. There were no bulk samples of previously assumed or new suspect asbestos-containing materials collected as part of this re-inspection.

**SUMMARY OF ASBESTOS MANAGEMENT PLAN CHANGES  
AHERA Re-inspection**

**Sky City Community School  
P.O. Box 349  
44 Pinsbaari Drive  
Acoma Pueblo, New Mexico**

As stated in 40 CFR 763.93(e)(10), the AHERA Management Plan shall include a description of steps taken to inform workers and building occupants, or their legal guardians, about inspections, re-inspections, response actions, and post-response action activities, including periodic re-inspection and surveillance activities that are planned or in progress.

A Limited Asbestos-Containing Material Survey conducted on July 16, 2012, and subsequent laboratory analysis of building material samples, found no ACBMs at the Sky City Community School.

The statement in the paragraph above may be reproduced for distribution to all workers, buildings occupants, and their legal guardians for the purposes of complying with the requirements of the AHERA Management Plan.



# AHERA Re-inspection of ACBM: Findings and Management Planner Recommendations

Page 01 of 01



School: Sky City Community School

Building: Building 100, Main School Building

Address: 44 Pinsbaari Drive, Acoma Pueblo, New Mexico

Date(s) of Re-inspection: July 16, 2012

Homogeneous Sampling Area: Material Description Textured Drywall Walls

RE-INSPECTION FINDINGS FOR ACBM					MANAGEMENT PLANNER RECOMMENDATIONS			
					Schedule			
Location(s) of ACBM by assessment category	Quantity	Fraility (F or NF)	Assessment category (1-7, X)	Justification of assessment category	Change in assessment (Yes or No)	Preventive measures, Response actions, and Initial/additional cleanings	Begin	Complete
Interior Walls throughout	4,500 square feet	NF	X	Non-ACBM	No	Material re-analyzed and shown to contain a trace of asbestos <1%. Remove this ACBM from the Management Plan.	9/10/12	
Were additional samples of this ACBM collected? Yes								
Inspector name: Joseph K. Palermo					Date of management planner review: August 14, 2012			
Inspector signature: 					Management planner name: Joseph K. Palermo			
Accreditation #/State: F 4666/Arizona					Management planner signature: 			
Expiration date: 5/4/2013					Accreditation #/State: F 4688/Arizona			
I, the LEA's Designated Person, have read and understood the recommendations made above:					Expiration date: 5/4/2013			
					Date:			

## **Project Limitations**

This Project was performed using, as a minimum, practices consistent with standards acceptable within the industry at this time, and a level of diligence typically exercised by EH&S consultants performing similar services.

The procedures used attempt to establish a balance between the competing goals of limiting investigative and reporting costs and time, and reducing the uncertainty about unknown conditions. Therefore, because the findings of this report were derived from the scope, costs, time and other limitations, the conclusions should not be construed as a guarantee that all universal, toxic and/or hazardous wastes have been identified and fully evaluated. Furthermore, Keres-IHI assumes no responsibility for omissions or errors resulting from inaccurate information, or data, provided by sources outside of Keres-IHI or from omissions or errors in public records.

It is emphasized that the final decision on how much risk to accept always remains with the client since Keres-IHI is not in a position to fully understand all of the client's needs. Clients with a greater aversion to risk may want to take additional actions while others, with less aversion to risk, may want to take no further action.

**LIMITED ASBESTOS-CONTAINING MATERIAL SURVEY**

**Sky City Community School**

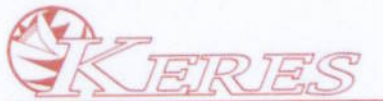
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**Submitted to:**

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**Submitted by:**



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Rod L. Pawloski  
Program Manager

**Reviewed by:**

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Joseph K. Palermo, LEED® AP  
Regional Manager

**Project No. 12P-A3077A**



## EXECUTIVE SUMMARY

As requested by the U.S. Department of Interior, Bureau of Indian Education (BIE), Keres Consulting (Keres) and IHI Environmental (IHI) recently conducted a limited asbestos survey of the Sky City Community School (SCCS), located at 44 Pinsbaari Drive in Acoma Pueblo, New Mexico (the Site). The survey was conducted by Keres-IHI personnel on July 16, 2012 and was limited to interior textured drywall walls in the Main School building (Bldg. 100).

The Site consists of four (4) buildings including the Main School (Bldg. 100), Bus Barn and Maintenance Shop (Bldg. 101), Storage (Bldg. 102), and Portable Classroom (Bldg. 104). Based on previous asbestos inspection reports in 2004, 2005, and 2009 and the Asbestos Management Plan, the Main School (Bldg. 100) was identified as the only building containing asbestos-containing building materials (ACBMs).

Keres-IHI's sampling and visual survey were conducted by Mr. Joseph Palermo. Mr. Palermo is an Environmental Protection Agency (EPA)-certified Asbestos Hazard Emergency Response Act (AHERA) building inspector for asbestos. The inspection was conducted in general accordance with procedures as set forth in EPA regulations, 40 Code of Federal Regulation (CFR) 763, Subpart E of AHERA. EMLab P&K (EMLab) in San Bruno, California, performed the laboratory analysis of the suspect ACBM samples. During the limited survey, six (6) samples were collected from the site and analyzed for the presence of asbestos.

Based on the results of our survey, laboratory analysis showed trace amounts of asbestos less than one percent (<1%) by EPA 400 point count method. As a result, the textured drywall is not considered to be ACBM as defined by AHERA.

The National Emissions Standards for Hazardous Air Pollutants (NESHAP) regulations require the removal of friable ACBM and non-friable ACBM that could become friable during demolition activities. Despite EPA rules exempting building materials containing 1% or less asbestos from stringent regulation, OSHA regulations outline specific precautionary work practices when employees work with materials containing any detectable amount of asbestos. Compliance by building owners with the OSHA asbestos regulations may result in response actions not required by the EPA for certain unregulated materials.

## TABLE OF CONTENTS

Section	Title	Page No.
<b>EXECUTIVE SUMMARY</b>		
1.0	INTRODUCTION AND BACKGROUND.....	1
2.0	DESCRIPTION OF INSPECTED AREAS .....	1
3.0	SURVEY PROCEDURES AND LABORATORY ANALYSES.....	2
4.0	FINDINGS.....	3
5.0	PROJECT LIMITATIONS .....	4
<b>APPENDICES</b>		
A.	Personnel AHERA Certification	
B.	Laboratory Certification	
C.	EMLab Analytical Reports and Chain-of-Custody Documentation	
D.	Bulk Sample Location Map	



## **LIMITED ASBESTOS-CONTAINING MATERIAL SURVEY**

**Sky City Community School**

**P.O. Box 349**

**44 Pinsbaari Drive**

**Acoma Pueblo, New Mexico**

### **1.0 INTRODUCTION AND BACKGROUND**

As requested by the U.S. Department of Interior, Bureau of Indian Education (BIE), Keres Consulting (Keres) and IHI Environmental (IHI) recently conducted a limited asbestos survey of the Sky City Community School (SCCS), located at 44 Pinsbaari Drive in Acoma Pueblo, New Mexico (the Site). The survey was conducted by Keres-IHI personnel on July 16, 2012 and was limited to interior textured drywall walls in the Main School building.

In 2009, ACME Environmental, Inc. of Albuquerque, New Mexico (ACME), completed an asbestos inspection at the Site as documented in their report *AHERA Asbestos Survey at Sky City Community School*, dated December 2, 2009. This previous asbestos inspection determined that the only asbestos-containing building materials (ACBMs) at the Site consist of textured drywall walls. ACME collected three (3) textured drywall samples from interior textured drywall surfaces. Two (2) of the three (3) samples showed no asbestos detected by laboratory analysis. A third sample was determined to contain 1.25% asbestos by point count analysis. The limited and incomplete sampling data, submitted by ACME, provided uncertainty regarding which textured drywall materials are ACBM at the Site.

### **2.0 DESCRIPTION OF INSPECTED AREAS**

The Site consists of four (4) buildings including the Main School (Bldg. 100), Bus Barn and Maintenance Shop (Bldg. 101), Storage (Bldg. 102), and Portable Classroom (Bldg. 104). Based on previous asbestos inspection reports in 2004, 2005, and 2009 and the Asbestos Management Plan, the Main School (Bldg. 100) was identified as the only building containing ACBMs. The Main School is a single-story concrete masonry unit (CMU) structure with a wood truss roof system, built on a concrete pad. This survey was limited to textured drywall walls in Building 100.



### 3.0 SURVEY PROCEDURES AND LABORATORY ANALYSES

Keres-IHI's sampling and visual survey were conducted by Mr. Joseph Palermo. Mr. Palermo is an Environmental Protection Agency (EPA)-certified Asbestos Hazard Emergency Response Act (AHERA) building inspector for asbestos. A copy of his current AHERA Building Inspector certificate is presented in Appendix A.

The inspection was conducted in general accordance with procedures as set forth in EPA regulations, 40 Code of Federal Regulation (CFR) 763, Subpart E of AHERA. EMLab P&K (EMLab) in San Bruno, California, performed the laboratory analysis of the suspect ACBM samples.

During the limited asbestos survey, each suspect ACBM was designated as a distinct homogeneous area, which is generally defined as a single material, uniform in texture and appearance, installed at one time, and unlikely to consist of more than one type or formulation of material. As part of our assessment, the inspector physically touched each suspect material to determine friability.

A sufficient number of samples were collected of each material to satisfy the Occupational Safety and Health Administration (OSHA) and National Emission Standards for Hazardous Air Pollutants (NESHAP) requirements for the determination of asbestos content. During the limited survey, six (6) samples were collected from the site and analyzed for the presence of asbestos.

As part of our survey, each sample was assigned a unique sample identification number. Each homogeneous area was also visually and physically assessed for material condition and assigned a NESHAP category if determined to be ACBM by laboratory analysis, as shown in Table 1. The samples were delivered to EMLab for analysis using standard chain-of-custody protocol. Once received, the samples were analyzed by Polarized Light Microscopy analysis, using EPA Method 600/R-93/116 (EPA-600/M4-82-020 (SOP01267)). Samples showing asbestos content less than 10% were re-analyzed by EPA 400 point count using EPA Method EPA-600/M4-82-020 (SOP01267).

EMLab is accredited by the National Institute for Science and Technology (NIST) under the National Voluntary Laboratory Accreditation Program (NVLAP) for bulk-asbestos sample



analysis administered by the NIST. A copy of the EMLab NVLAP certification (Accreditation No. 200728-0) is presented in Appendix B.

#### 4.0 FINDINGS

The analytical results of Keres-IHI's asbestos survey are presented in Table 1 below. The EMLab report, along with chain-of-custody documentation, is presented in Appendix C. A bulk sample location map is presented in Appendix D.

**TABLE 1: Limited Asbestos Survey Results – Sky City Community School (Bldg. 100)  
44 Pinsbaari Drive, Acoma Pueblo, New Mexico (July 16, 2012)**

Sample Number	Material	Sample Location	Category/ Friability	ACBM	Condition
SCCS-DRY-01	Joint compound/paint Drywall	Room 327, West wall	S/NF	None Detected None Detected	Good
SCCS-DRY-02	Joint compound/paint Drywall	Room 333, Southwest corner	S/NF	None Detected None Detected	Good
SCCS-DRY-03	Joint compound/paint Drywall	Room 325, Southeast corner	S/NF	None Detected None Detected	Good
SCCS-DRY-04	Joint compound/paint Drywall	Corridor 336, Southwest corner	S/NF	None Detected None Detected	Good
SCCS-DRY-05	Joint compound Drywall	Corridor 507, East wall	S/NF	≤1% Chrysotile None Detected	Good
SCCS-DRY-06	Joint compound Drywall	Room 303, Ceiling	S/NF	≤1% Chrysotile None Detected	Good
<b>Notes:</b> 1. Category (M = Miscellaneous; S = Surfacing; TSI = Thermal System Insulation) 2. Friability (F = Friable; NF = Non-friable) 3. <1% Chrysotile determined by EPA 400 Point Count EPA Method EPA-600/M4-82-020 4. A total of 4,500 square feet of textured drywall walls was estimated in Building 100.					

Based on the results of our survey, laboratory analysis showed trace amounts of asbestos less than one percent (<1%) by EPA 400 point count method. As a result, the textured drywall is not considered to be ACBM as defined by AHERA.

Although the previous ACME report determined that one sample of the textured drywall at the Site contained 1.25% asbestos by point count, the resultant determination that the textured drywall is considered ACBM may likely have been misinterpreted. As stated in the AHERA 40 CFR 763, Subpart E, Appendix E, 1.7.2.4, *Quantitation of Asbestos Content*, "The value reported should be rounded to the nearest percent". The previous find of 1.25% asbestos by point count should be interpreted to be rounded down to 1.0% and therefore not determined to be ACBM.



NESHAP regulations require the removal of friable ACBM and non-friable ACBM that could become friable during demolition activities. Despite EPA rules exempting building materials containing 1% or less asbestos from stringent regulation, OSHA regulations outline specific precautionary work practices when employees work with materials containing any detectable amount of asbestos. Compliance by building owners with the OSHA asbestos regulations may result in response actions not required by the EPA for certain unregulated materials.

Under the OSHA Construction Standard for Asbestos (29 CFR 1926.1101), drywall containing less than or equal to 1% asbestos is still regulated to some degree. The employer who disturbs this asbestos material must, 1) use wet methods, 2) promptly contain any waste in leak-tight containers, and 3) conduct air monitoring or have a negative exposure assessment. The waste is not regulated for transportation or disposal by EPA or OSHA.

## **5.0 PROJECT LIMITATIONS**

This Project was performed using, as a minimum, practices consistent with standards acceptable within the industry at this time, and a level of diligence typically exercised by industrial hygiene and environmental consultants performing similar services.

The procedures used in this investigation attempt to establish a balance between the competing goals of limiting investigative and reporting costs and time, and reducing the uncertainty about unknown conditions. Therefore, because the findings of this report were derived from the scope, costs, time, and other limitations, the conclusions should not be construed as a guarantee that all environmental or occupational hazards have been identified and fully evaluated. Where sample collection and testing have been performed, Keres-IHI's professional opinions are based in part on the interpretation of data from discrete sampling locations that may not represent conditions at non-sampled locations.

Keres-IHI assumes no responsibility for omissions or errors resulting from inaccurate information, or data, provided by sources outside of Keres-IHI or from omissions or errors in public records. Furthermore, it is emphasized that the final decision on how much risk to accept always remains with the client since Keres-IHI is not in a position to fully understand all of the client's needs. Clients with a greater aversion to risk may want to take additional actions while others, with less aversion to risk, may want to take no further action.



**APPENDIX A**

**IHI Personnel AHERA Certification**

# THE ASBESTOS INSTITUTE

Certifies that

**Joseph K Palermo**

has attended the EPA approved course

**AHERA Building Inspector Refresher**

**Approval Code: CA-089-06**

**May 4, 2012**

and successfully passed the competency exam.

Date of Examination: **May 4, 2012**

Date of Expiration: **May 4, 2013**



William T. Cavness  
Director



Approved Instructor

THE ASBESTOS INSTITUTE

20033 N. 19th Avenue

Building #6

Phoenix, AZ 85027

602-864-6564



# THE ASBESTOS INSTITUTE

Certifies that

**Joseph K Palermo**

has attended the EPA approved course  
**AHERA Management Planner Refresher**  
**Approval Code: CA-089-08**  
**May 4, 2012**

and successfully passed the competency exam.

Date of Examination: **May 4, 2012**

Date of Expiration: **May 4, 2013**



William T. Cavness  
Director



Approved Instructor

THE ASBESTOS INSTITUTE  
20033 N. 19th Avenue  
Building #6  
Phoenix, AZ 85027  
602-864-6564

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# THE ASBESTOS INSTITUTE

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Certifies that

**Rod L Pawloski**

has attended the EPA approved course

**AHERA Refresher  
Building Inspector  
December 2, 2011**

and successfully passed the competency exam.

Date of Examination: **December 2, 2011**

Date of Expiration: **December 2, 2012**



William T. Cavness  
Director



Approved Instructor

**THE ASBESTOS INSTITUTE**

8102 North 23rd Avenue

Suite A

Phoenix, AZ 85021-4962

602-864-6564



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**AHERA Refresher  
Management Planner  
December 2, 2011**

and successfully passed the competency exam.

Date of Examination: **December 2, 2011**

Date of Expiration: **December 2, 2012**



William T. Cavness  
Director



Approved Instructor

THE ASBESTOS INSTITUTE

8102 North 23rd Avenue

Suite A

Phoenix, AZ 85021-4962

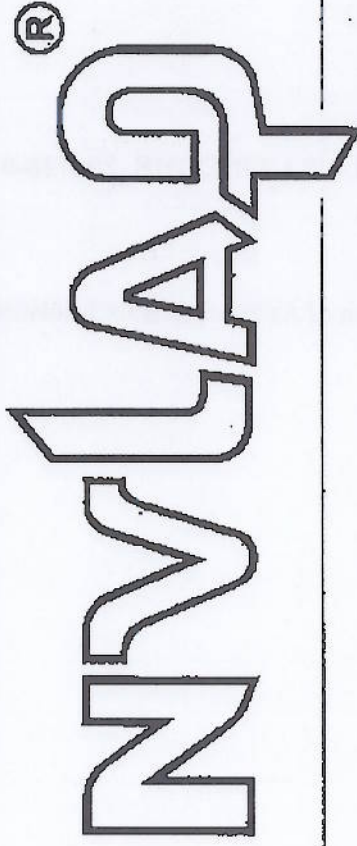
602-864-6564

APPENDIX B

Laboratory Certification



United States Department of Commerce  
National Institute of Standards and Technology



## Certificate of Accreditation to ISO/IEC 17025:2005

NVLAP LAB CODE: 200728-0

**EMLab P&K, LLC**  
San Bruno, CA

is accredited by the National Voluntary Laboratory Accreditation Program for specific services,  
listed on the Scope of Accreditation, for:

### **BULK ASBESTOS FIBER ANALYSIS**

This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2005.  
This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality  
management system (refer to joint ISO-ILAC-IAF Communiqué dated January 2009).

2012-07-01 through 2013-06-30

Effective dates



A handwritten signature in dark ink, appearing to read "Michael D. Milled", is written over the official seal.

For the National Institute of Standards and Technology



**National Voluntary  
Laboratory Accreditation Program**



**SCOPE OF ACCREDITATION TO ISO/IEC 17025:2005**

**EMLab P&K, LLC**  
1150 Bayhill Drive  
Suite 100  
San Bruno, CA 94066  
Mr Tim Costello  
Phone: 650-228-6938 Fax: 650-742-8162  
E-Mail: [tcostello@emlabpk.com](mailto:tcostello@emlabpk.com)  
URL: <http://www.emlabpk.com>

**BULK ASBESTOS FIBER ANALYSIS (PLM)**

**NVLAP LAB CODE 200728-0**

***NVLAP Code      Designation / Description***

18/A01      EPA-600/M4-82-020: Interim Method for the Determination of Asbestos in Bulk Insulation Samples

2012-07-01 through 2013-06-30

*Effective dates*

*For the National Institute of Standards and Technology*





## APPENDIX C

### EMLab Analytical Reports and Chain-of-Custody Documentation

Appendix C contains EMLab Analytical Reports and Chain-of-Custody Documentation. This section is intended to provide a clear and concise summary of the analytical results and the chain of custody for the samples analyzed. The information provided in this section is for informational purposes only and should not be used for legal or regulatory purposes. The information provided in this section is for informational purposes only and should not be used for legal or regulatory purposes.



Report for:

Mr. Joe Palermo  
IHI Environmental, Phoenix  
4527 N. 16th Street  
Suite 105  
Phoenix, AZ 85016

Regarding: Project: 12P-A3077; Keres-BIE NM  
EML ID: 947289

Approved by:

Dates of Analysis:  
Asbestos-EPA Method 600/R-93/116: 07-24-2012

Technical Manager  
Miguel Ines

Service SOPs: Asbestos-EPA Method 600/R-93/116 (EPA-600/M4-82-020 (SOP 01267))

All samples were received in acceptable condition unless noted in the Report Comments portion in the body of the report. The results relate only to the items tested. The results include an inherent uncertainty of measurement associated with estimating percentages by polarized light microscopy. Measurement uncertainty data can be provided when requested.

EMLab P&K ("the Company") shall have no liability to the client or the client's customer with respect to decisions or recommendations made, actions taken or courses of conduct implemented by either the client or the client's customer as a result of or based upon the Test Results. In no event shall the Company be liable to the client with respect to the Test Results except for the Company's own willful misconduct or gross negligence nor shall the Company be liable for incidental or consequential damages or lost profits or revenues to the fullest extent such liability may be disclaimed by law, even if the Company has been advised of the possibility of such damages, lost profits or lost revenues. In no event shall the Company's liability with respect to the Test Results exceed the amount paid to the Company by the client therefor.

Document Number: 200091 - Revision Number: 5

EMLab P&K, LLC

EMLab ID: 947289, Page 1 of 4



Client: IHI Environmental, Phoenix  
C/O: Mr. Joe Palermo  
Re: 12P-A3077; Keres-BIE NM

Date of Sampling: 07-16-2012  
Date of Receipt: 07-19-2012  
Date of Report: 07-24-2012

**ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116****Location: SCCS-DRY-01, Textured drywall**

Lab ID-Version‡: 4221637-1

Sample Layers	Asbestos Content
White Joint Compound With Paint	ND
White Drywall	ND
<b>Composite Non-Asbestos Fibrous Content:</b>	10% Cellulose
<b>Sample Composite Homogeneity:</b>	Good

**Location: SCCS-DRY-02, Textured drywall**

Lab ID-Version‡: 4221638-1

Sample Layers	Asbestos Content
White Joint Compound With Paint	ND
White Drywall	ND
<b>Composite Non-Asbestos Fibrous Content:</b>	10% Cellulose
<b>Sample Composite Homogeneity:</b>	Good

**Location: SCCS-DRY-03, Textured drywall**

Lab ID-Version‡: 4221639-1

Sample Layers	Asbestos Content
White Joint Compound With Paint	ND
White Drywall	ND
<b>Composite Non-Asbestos Fibrous Content:</b>	10% Cellulose
<b>Sample Composite Homogeneity:</b>	Good

**Location: SCCS-DRY-04, Textured drywall**

Lab ID-Version‡: 4221640-1

Sample Layers	Asbestos Content
White Joint Compound With Paint	ND
White Drywall	ND
<b>Composite Non-Asbestos Fibrous Content:</b>	10% Cellulose
<b>Sample Composite Homogeneity:</b>	Good

The results relate only to the items tested. Interpretation is left to the company and/or persons who conducted the field work. The test report shall not be reproduced except in full, without written approval of the laboratory. The report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the federal government.

All samples were received in acceptable condition unless otherwise noted. EMLab P&K reserves the right to dispose of all samples after a period of thirty (30) days, according to all state and federal guidelines, unless otherwise specified.

Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed.

‡ A "Version" indicated by "-x" after the Lab ID# with a value greater than 1 indicates a sample with amended data. The revision number is reflected by the value of "x".

Client: IHI Environmental, Phoenix  
C/O: Mr. Joe Palermo  
Re: 12P-A3077; Keres-BIE NMDate of Sampling: 07-16-2012  
Date of Receipt: 07-19-2012  
Date of Report: 07-24-2012**ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116****Location: SCCS-DRY-05, Textured drywall**

Lab ID-Version‡: 4221641-1

Sample Layers	Asbestos Content
White Joint Compound	< 1% Chrysotile
White Drywall	ND
<b>Composite Asbestos Fibrous Content:</b>	< 1% Asbestos
<b>Composite Non-Asbestos Fibrous Content:</b>	10% Cellulose
<b>Sample Composite Homogeneity:</b>	Good

**Comments:** Composite asbestos content provided is only for Drywall/Joint compound. Composite content provided does not follow the guidelines set forth by NVLAP. This analysis was performed by following the NESHAP guidelines.

**Location: SCCS-DRY-06, Textured drywall**

Lab ID-Version‡: 4221642-1

Sample Layers	Asbestos Content
White Joint Compound	< 1% Chrysotile
White Drywall	ND
<b>Composite Asbestos Fibrous Content:</b>	< 1% Asbestos
<b>Composite Non-Asbestos Fibrous Content:</b>	10% Cellulose
<b>Sample Composite Homogeneity:</b>	Good

**Comments:** Composite asbestos content provided is only for Drywall/Joint compound. Composite content provided does not follow the guidelines set forth by NVLAP. This analysis was performed by following the NESHAP guidelines.

The results relate only to the items tested. Interpretation is left to the company and/or persons who conducted the field work. The test report shall not be reproduced except in full, without written approval of the laboratory. The report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the federal government.

All samples were received in acceptable condition unless otherwise noted. EMLab P&K reserves the right to dispose of all samples after a period of thirty (30) days, according to all state and federal guidelines, unless otherwise specified.

Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed.

‡ A "Version" indicated by "-x" after the Lab ID# with a value greater than 1 indicates a sample with amended data. The revision number is reflected by the value of "x".





Report for:

**Mr. Joe Palermo**  
**IHI Environmental, Phoenix**  
4527 N. 16th Street  
Suite 105  
Phoenix, AZ 85016

Regarding: Project: 12P-A3077; Keres-BIE NM  
EML ID: 947289

Approved by:

Dates of Analysis:  
Asbestos-EPA 400 point count: 07-30-2012

*Miguel Constantino Ines*

Technical Manager  
Miguel Ines

Service SOPs: Asbestos-EPA 400 point count (EPA-600/M4-82-020 (SOP 01262))

All samples were received in acceptable condition unless noted in the Report Comments portion in the body of the report. Due to the nature of the analyses performed, field blank correction of results is not applied. The results relate only to the items tested.

EMLab P&K ("the Company") shall have no liability to the client or the client's customer with respect to decisions or recommendations made, actions taken or courses of conduct implemented by either the client or the client's customer as a result of or based upon the Test Results. In no event shall the Company be liable to the client with respect to the Test Results except for the Company's own willful misconduct or gross negligence nor shall the Company be liable for incidental or consequential damages or lost profits or revenues to the fullest extent such liability may be disclaimed by law, even if the Company has been advised of the possibility of such damages, lost profits or lost revenues. In no event shall the Company's liability with respect to the Test Results exceed the amount paid to the Company by the client therefor.

Document Number: 200091 - Revision Number: 5

EMLab P&K, LLC

EMLab ID: 947289, Page 1 of 3

Client: IHI Environmental, Phoenix  
C/O: Mr. Joe Palermo  
Re: 12P-A3077; Keres-BIE NM

Date of Sampling: 07-16-2012  
Date of Receipt: 07-19-2012  
Date of Report: 07-30-2012

**ASBESTOS POINT COUNT REPORT: EPA METHOD 600/R-93-116**

Location:	SCCS-DRY-05 Textured drywall		
Total Points Counted:	400		
Lab ID-Version‡:	4228425-1		
Sample Layers	Asbestos Type	Asbestos Points Counted	Asbestos Concentration (%)
White Joint Compound	Chrysotile	0	< 0.25
<b>Layer Totals:</b>		0	NA

**Comments:** Asbestos was detected, but no points counted.

Location:	SCCS-DRY-06 Textured drywall		
Total Points Counted:	400		
Lab ID-Version‡:	4228426-1		
Sample Layers	Asbestos Type	Asbestos Points Counted	Asbestos Concentration (%)
White Joint Compound	Chrysotile	0	< 0.25
<b>Layer Totals:</b>		0	NA

**Comments:** Asbestos was detected, but no points counted.

The results relate only to the items tested. Interpretation is left to the company and/or persons who conducted the field work. The test report shall not be reproduced except in full, without written approval of the laboratory. The report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the federal government.

All samples were received in acceptable condition unless otherwise noted. EMLab P&K reserves the right to dispose of all samples after a period of thirty (30) days, according to all state and federal guidelines, unless otherwise specified.

‡ A "Version" indicated by "-x" after the Lab ID# with a value greater than 1 indicates a sample with amended data. The revision number is reflected by the value of "x".





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Ft. Lauderdale, FL: 6301 NW 5th Way, #2850, Ft. Lauderdale, FL 33309 • AHA EMLAP #173067  
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**CONTACT INFORMATION**

Company: **IHI Environmental**

Address: **Phoenix, AZ**

Special Instructions:

Contact: **J. Palermo**

Phone: **602-776-0300**

**PROJECT INFORMATION**

Project ID: **12P-A3077**

Project Desc: **Reves-BIE NM**

Project Zip Code: **N/A** Sampling Date: **7/16/12**

PO Number: **N/A**

**TURN AROUND TIME CODES - (TAT)**

STD - Standard (48-72 Hour, DIB/AULT)

ND - Next Day (24 Hours)

SD - Same Business Day Rush

WH - Weekend/Holiday

Rushes received after 2pm or on weekends, will be considered the next business day. Please alert us in advance of weekend analysis needs.

WEATHER	Fog	Rain	Snow	Wind	Clear
None					
Light					
Moderate					
Heavy					

REQ

Non-Culturable

Spore Trap

Bio

Other Requests

000947289

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Premium Requires additional subcultures approx. 4 wk lead

Fungal - Full Speciation

Fungal w/ Clad. & Asp. Speciation

Fungal w/ Penetration & Asp. Speciation

Legionella - Quantitative Analysis (water & swabs only)

Sewage Assessment / Clearance

Ecol / Coliform Screen (24hr, 48hr, VPH, VPH, push, etc.)

Bacteria - Quantitative Analysis (3 Genus ID)

Fungal - Standard Quant. Analysis (incl. Asp. Speciation)

Fungal - Direct Microscopic Exam

Fungal & Biological Particles - Spore Trap Analysis

Sungl - Spore Trap Analysis

Asbestos Analysis - PCM Airborne Fiber Count (NIOSH 7403)

Asbestos Analysis - PLM (EPA method 600/R-93-119)

SAMPLE TYPE CODES				RELINQUISHED BY	DATE & TIME
BC - BioCassette	CP - Contact Plate	T - Tape	D - Disc	<i>J. Palermo</i>	7/18/12
A1S - Andersen 1-stage	ST - Spore Trap	SW - Swab	W - Water		
A2S - Andersen 2-stage	Zelen, Allergenco, Burkard..	B - Bulk	SO - Soil		
SAS - Surface Air Sampler	P - Pure Culture	O - Other:			

RECEIVED BY	DATE & TIME
<i>[Signature]</i>	7-19-12 9:20

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Download our COC for Allergen Analysis at www.EMLab.com

## APPENDIX D

### Bulk Sample Location Map



